

Draft Finding of No Significant Impact

Programmatic Environmental Assessment (PEA) of Modularization of Army National Guard Forces

Pursuant to the Council on Environmental Quality regulations (40 CFR Parts 1500-1508) for implementing the procedural provisions of the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and 32 Code of Federal Regulations Part 651 (*Environmental Analysis of Army Actions*), the National Guard Bureau (NGB) has conducted a Programmatic Environmental Assessment (PEA) of the potential environmental and socioeconomic effects associated with modularization of Army National Guard (ARNG) forces.

Proposed Action.

Consistent with guidance contained in the ARNG Campaign Plan, over the next 4 years the NGB proposes to convert the force structure and equipment of all ARNG combat brigades to “modular” brigade combat team units of action (BCT(UA)s). The proposed action would involve the transfer of authorizations for two brigades to the Active Component and the in-place conversion of all remaining combat brigades. At the completion of this portion of the proposed action, there would be 10 Heavy BCT(UA)s and 23 Infantry BCT(UA)s. Transformation of the 56th Stryker Brigade Combat Team is proceeding independently and is not a part of this proposal. Also as part of the proposed action, the eight division headquarters within the ARNG would be reorganized to create modular units of employment (UEs) to provide command and control of organic, assigned, and attached forces. Finally, ARNG Combat Service and Combat Service Support personnel and equipment would be reorganized into various types of support units of action (SUAs).

The proposed action is needed to reorganize combat forces into units whose structure, equipment, and training comply with the evolving requirements of the ARNG Campaign Plan. The need for the proposed action is to improve the ability of the Nation to respond rapidly to the challenges of the 21st century. Restructuring of ARNG organizations is needed to create forces that are more stand-alone and alike (“modular”) while retaining their broad-spectrum capability.

Alternatives.

The NGB considered two alternatives to the proposed action.

- *Non-modular Structure.* Under the ARNG Campaign Plan, which carries out actions set in motion in the Army’s Campaign Plan, the NGB is tasked to restructure certain forces into modular units of designated sizes having specified capabilities and weapons systems and other equipment. Deviation from the general precepts and specific requirements of Headquarters, Department of the Army directives would jeopardize the Army’s implementation of its transformation program. In this light, this alternative was found to be infeasible, and it was not evaluated in detail in the PEA.

- *Partial Reorganization of ARNG Forces.* Under this alternative, the NGB would direct modularization of only portions of ARNG forces; the remaining portions of ARNG forces would retain their historical division-centric structural design. Implementation of this alternative was deemed infeasible and, accordingly, was not evaluated in detail in the PEA.

Consistent with guidance issued by the Council on Environmental Quality, the PEA evaluated the no action alternative.

Environmental Consequences.

The PEA, which is herewith incorporated, considered potential effects on real property, air quality, noise, water resources, geology and soils, biological resources, cultural resources, hazardous materials and hazardous wastes, and socioeconomics (including environmental justice and protection of children). Effects would occur as a result of weapons systems and equipment use, training, and institutional matters. Implementation of the proposed action would result in no expected effects on most of the resources evaluated. Effects would be expected on four types of resources, as discussed in the following paragraphs.

- *Effects on the noise environment.* Long-term minor beneficial effects would be expected. Elimination of more than half of the ARNG organizations' tracked vehicles would reduce the number of heavy, noisy vehicles with respect to both engine noise and organic weapons (the Abrams tank operates with a 120-mm smooth-bore cannon, and the Bradley Infantry Fighting Vehicle operates with a 25-mm chain gun and the TOW antitank missile). Plans for types and quantities of vehicles in the infantry brigades have not been finalized; operations involving Humvees and medium trucks would offset some of the noise reductions attributable to elimination of tanks and other tracked vehicles. Additional changes in the quantities of noise-producing weapons systems would also occur. Numerous personnel in units currently equipped with various towed artillery and air defense weapons systems would be transferred and retrained for duties in other types of units.
- *Effects on water resources.* Long-term minor beneficial effects would be expected. The reduction of the number of tracked vehicles by more than 50 percent would provide a long-term minor indirect benefit to surface water quality. When operated off-road, tracked vehicles tend to crush vegetation and compact soil, thus affecting the ability of vegetative cover to slow the conveyance of precipitation to surface waters. If there were less harm to vegetation and soils, there would be less sedimentation of surface waters.
- *Effects on geology and soils.* Elimination of more than half of the tanks, Bradley Fighting Vehicles, and armored personnel carriers now fielded to ARNG organizations would result in a beneficial reduction of effects on soils. This outcome would be more pronounced at installations that have soils susceptible to erosion.

- *Effects on biological resources.* Long-term minor beneficial effects would be expected. Elimination of numerous tracked vehicles fielded to ARNG organizations would result in a beneficial reduction of effects on vegetation. These benefits would be more noticeable at training facilities in dry climates, where shorter growing seasons tend to feature more fragile vegetation than that in wetter climates and climates with longer growing seasons.

ARNG organizations will conduct additional analyses, as appropriate, to address site-specific environmental effects.

Under the no action alternative, no effects would be expected. No cumulative effects were identified.

Mitigation.

Because no adverse effects are expected upon implementation of the proposed action, no specific mitigation actions are recommended. To guard against the development of circumstances that could in limited cases result in site-specific adverse effects, the NGB and ARNG organizations will maintain their stewardship posture by implementing best management practices designed to safeguard environmental resources. Additionally, site-specific mitigation measures may be developed pursuant to follow-on analyses.

Regulations.

The Proposed Action would not violate the National Environmental Policy Act (42 USC § 4321 to 4370e), its regulations promulgated by the CEQ (40 CFR parts 1500-1508), 32 CFR Part 651, *Environmental Analysis of Army Actions*, or any other federal, state, or local environmental regulations.

Commitment to Implementation.

The National Guard Bureau (NGB) affirms its commitment to implement the PEA for the conversion of the ARNG to the Army Modular Force. Implementation is dependent on funding. The NGB Environmental Programs, Training, and Installations Divisions will ensure that adequate funds are requested in future years' budgets.

Public Review and Comment.

A copy of the PEA may be obtained by writing to Mr. Rick Breitenfeldt, Office of Public Affairs and Strategic Communications, National Guard Bureau, 1411 Jefferson Davis Highway, Suite 11200, Arlington, Virginia 22202-3231 or by e-mail request to rick.breitenfeldt@ngb.army.mil. The PEA may also be viewed at <http://www.arng.army.mil/nepa>. Written comments on the proposed action, the PEA, or this draft Finding of No Significant Impact may be submitted to the NGB at the foregoing street address.

The draft PEA was made available for public review and comment from 17 March to 15 April 2005. No public comments were received during the comment period.

Draft Finding of No Significant Impact.

After careful review of the PEA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment. Per 32 CFR Part 651, the final PEA and draft FNSI will be made available for a 30-day public review and comment period. Once any public comments have been addressed and if a determination is made that the proposed action will have no significant impact, the FNSI will be signed and the action will be implemented. This analysis fulfills the requirements of NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared, and the National Guard Bureau is issuing this Finding of No Significant Impact.

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Date